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13   UNITED STATES DISTRICT COURT

14   FOR THE EASTERN DISTRICT OF CALIFORNIA

15 JEREMY PHILLIP PUCKETT,	Case No.: 2:22-00350-KJM-DB
16 Plaintiff,	**STIPULATION TO REQUEST FOR CONTINUANCE OF MOTION**
17 v.	**HEARINGS AND INITIAL STATUS (PRETRIAL SCHEDULING) CONFERENCE**
18 COUNTY OF SACRAMENTO, SACRAMENTO COUNTY	
19 SHERIFF'S OFFICE, SACRAMENTO COUNTY DISTRICT ATTORNEY'S	Action Filed: February 22, 2022
20 OFFICE, MARJORIE DURENBERGER, MARCI MINTER,	Trial Date: To be determined
21 LORI GREGERSEN, WILLARD BAYLES, ROBERT BELL, KAY	
22 MAULSBY, DONALD HENRIKSON, AND DOES 1 through 50,	
23 Defendants.	
24	

25   Plaintiff JEREMY PUCKETT and Defendants COUNTY OF SACRAMENTO,

26 SACRAMENTO COUNTY SHERIFF'S OFFICE, SACRAMENTO COUNTY DISTRICT

27 ATTORNEY'S OFFICE, MARJORIE DURENBERGER, MARCI MINTER, LORI

28 GREGERSEN, WILLARD BAYLES, ROBERT BELL, KAY MAULSBY and DONALD

STIPULATION TO REQUEST CONTINUANCE   1

1   HENRIKSON (collectively "Defendants") hereby stipulate to and request a continuance of the

2   August 19, 2022 Initial Scheduling Conference, August 19, 2022 hearings on Defendants' Motions

3   to Dismiss (Dkt Nos. 16 & 18), and August 19, 2022 hearing on Defendant Henrikson's Motion to

4   Strike Portions of Plaintiff's Complaint (Dkt No. 19) until October 21, 2022, in order to enable

5   Plaintiff's lead trial counsel to attend the conference and hearings. October 21, 2022 is the Court's

6   next available civil law and motion hearing date for which all parties' counsel are available.

7   Notwithstanding this stipulation and request, the parties have complied with the existing deadlines

8   for conferring over preparation of a joint status report as required by Federal Rule of Civil Procedure

9   26, Local Rule 240(b), and this Court's Order Setting Status (Pretrial Scheduling) Conference.

10   Pursuant to this Court's Order Setting Status (Pretrial Scheduling) Conference and Local

11   Rule 230(f), this stipulation requests court approval of the parties' request for continuance of the

12   above-referenced proceedings.

13   **IT IS SO STIPULATED.**

14   Dated: August 3, 2022   By: /s/ *Harrison J. Frahn*
                                                        Harrison J. Frahn IV
15   SIMPSON THACHER & BARTLETT LLP
                                                        2475 Hanover Street
16   Palo Alto, California 94304

17   *Attorneys for Plaintiff Jeremy Phillip Puckett*

18
     Dated: August 3, 2022   By: /s/ *John R. Whitefleet* (auth'd on 8/3/2022)
19   John R. Whitefleet
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20   A PROFESSIONAL CORPORATION
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21   Sacramento, California 95825

22   *Attorneys for Defendants COUNTY OF*
                                                        SACRAMENTO, SACRAMENTO COUNTY
23   *SHERIFF'S OFFICE, SACRAMENTO COUNTY*
                                                        DISTRICT ATTORNEY'S OFFICE, MARJORIE
24   *DURENBERGER, MARCI MINTER, LORI*
                                                        GREGERSEN, WILLARD BAYLES, ROBERT
25   *BELL, and KAY MAULSBY*

26

27

28

Dated: August 3, 2022

By: /s/ *Pamela Shafer* (auth'd on 8/3/22)
David T. Shuey
Pamela Shafer
RANKIN, SHUEY, RANUCCI, MINTZ,
LAMPASONA & REYNOLDS
2030 Franklin Street, Sixth Floor
Oakland, CA 94612
Attorneys for Defendant DONALD HENRIKSON

ORDER

The foregoing continuances of the Initial Scheduling Conference and hearings on Defendants' Motions to Dismiss and Motion to Strike to November 4, 2022[1] is hereby approved by the Court.

IT IS SO ORDERED.

DATED: August 10, 2022.

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CHIEF UNITED STATES DISTRICT JUDGE

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[1] The parties' request for October 21, 2022, is not a viable Civil Law and Motion date for Judge Mueller.

STIPULATION TO REQUEST CONTINUANCE   3